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14 Uber Technologies, Inc.

15
16 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

17 CAREN EHRET,

18 Plaintiff,

19 v.

20 UBER TECHNOLOGIES, Inc.,

21 Defendant.

Case No. 3:14-cv-00113-EMC

**[PROPOSED] STIPULATION AND
ORDER**

Judge: Edward M. Chen

Pursuant to the Court's Order of November 26, 2014, Defendant Uber Technologies, Inc. ("Uber") and Plaintiff Caren Ehret ("Plaintiff"), by and through their attorneys of record, stipulate as follows:

1. The deadline for Uber's production of emails and other ESI from additional custodians Travis Kalanick, Ryan Graves and Andrew Macdonald shall be January 23, 2015.
2. The deadline for Plaintiff's filing of a motion for class certification shall be extended to March 12, 2015. The deadline for Uber's filing of its opposition to Plaintiff's motion for class certification shall be extended to April 16, 2015, and the deadline for Plaintiff's reply shall be extended to May 14, 2015.

Uber enters this stipulation without prejudice to Uber's right to object to Judge Ryu's November 26, 2014 order regarding custodians and date ranges and the timeline for production, and reserves its right to file an objection to the order with Judge Chen. Plaintiff reserves her right to oppose such an objection.

DATED: December 9, 2014

By /s/ Stephen A. Swedlow
 Stephen A. Swedlow
 Quinn Emanuel Urquhart & Sullivan, LLP
 Attorney for Uber Technologies, Inc.

DATED: December 9, 2014

By /s/ Hall Adams¹
 Hall Adams
 Law Offices of Hall Adams LLC
 Attorneys for Plaintiff

¹ I, Stephen A. Swedlow, certify that Hall Adams concurs in the filing of this document.

ORDER

GOOD CAUSE APPEARING, the Court hereby approves this Stipulation.

IT IS SO ORDERED. The hearing on the class certification motion is set for 6/4/15 at 1:30 p.m. CMC is reset
Dated: 12/10/14 from 4/23/15 to 6/4/15 at 1:30 p.m. An updated
joint CMC ~~statement due 5/28/15.~~
Judge Edward M. Chen

